

EXHIBIT B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	Chapter 11
FTX TRADING LTD., <i>et al.</i> ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
In re	Chapter 15
FTX DIGITAL MARKETS LTD. ²	Case No. 22-11217 (JTD)
Debtor in a Foreign Proceeding.	

**ORDER GRANTING EMERGENCY MOTION OF THE
JOINT PROVISIONAL LIQUIDATORS OF FTX DIGITAL MARKETS LTD.
(I) FOR RELIEF FROM AUTOMATIC STAY AND (II) TO COMPEL
TURNOVER OF ELECTRONIC RECORDS UNDER
SECTIONS 542, 1519(A)(3), 1521(A)(7) AND 1522 OF THE BANKRUPTCY CODE**

Upon the consideration of the emergency motion (the “**Motion**”)³ of Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves (“**Joint Provisional Liquidators**”), in their capacity as the duly appointed joint provisional liquidators of FTX Digital Markets Ltd. (“**FTX Digital**”) and foreign representatives of the Provisional Liquidation of FTX Digital, for entry of an order

(i) granting FTX Digital relief from the automatic stay in the Chapter 11 Cases under section

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the U.S. Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² FTX Digital Markets Ltd. (in Provisional Liquidation) was incorporated in the Commonwealth of The Bahamas as an International Business Company, registered number 207269B.

³ Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

362(d) of the Bankruptcy Code and (ii) requiring the U.S. Debtors to provide access to the Recorded Information under sections 542(a), 542(e), 1519(a)(3), 1521(a)(7) and 1522 of the Bankruptcy Code, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED as set forth herein.
2. The automatic stay imposed in Chapter 11 Cases by section 362(a) of the Bankruptcy Code, to the extent applicable, is hereby modified to allow the Joint Provisional Liquidators to seek the relief requested in the Motion.
3. The relief from the automatic stay shall be effective immediately upon entry of this Order and the 14-day stay provided in Bankruptcy Rule 4001(a)(3) shall not apply.
4. The U.S. Debtors shall provide the Joint Provisional Liquidators with access to the Recorded Information.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.